MATTER 3 ‘OBJECTIVELY ASSESSED NEEDS FOR HOUSING AND EMPLOYMENT LAND’

WEALDEN LOCAL PLAN EXAMINATION

STATEMENT PREPARED BY QUOD

(RESPONDENT REFERENCE: 1186776)

MAY 2019
Matter 3: Objectively Assessed Needs for Housing and Employment Land

Issue 1: Whether the Council’s approach to calculating its full, objectively assessed needs is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?

Question 48. Does the plan period cover an appropriate time frame for the provision of housing (2013-2028), and is it consistent with national policy? Should it be extended. If so, why? Why is a different time period chosen to that set for employment and retail matters?

1.1 The timeframe for the Wealden Local Plan (WLP) is inconsistent with national policy.

1.2 The National Planning Policy Framework (2012) (NPPF), which the Plan should be assessed against, states (para. 157) that Local Plans should be "drawn up over an appropriate time scale, preferably a 15-year time horizon".

1.3 The proposed time period of the Local Plan is for the period 2013 to 2028. This is despite the fact that the latest Local Development Scheme published by Wealden District Council (WDC) does not anticipate adoption until 2019. Although this may be optimistic, even if this timeframe is achieved, it will mean that there will be just 9 years left to deliver substantial housing.

1.4 The proposed short plan-period results in failing to suitably plan for long-term needs. In light of this, and consistent with the recommendations of the NPPF, the Plan period should be extended to cover a full 15-year development period from adoption to 2033.

Question 50. Is Wealden’s functional housing market discrete? How has the housing requirement for the wider HMA been considered with particular reference to the South Downs National Park and Eastbourne BC? Should an OAHN for the wider HMA have been set in addition to the OAHN which is specific to Wealden? What influence have the overlapping and neighbouring housing markets had on the setting of Wealden’s OAHN, in particular those of Eastbourne and the South Down’s National Park?

1.5 The housing market is not discrete. As reflected in the Council’s own evidence the HMA extends to cover the neighbouring authorities of Eastbourne Borough, Tunbridge Wells Borough, Rother District, Lewes District and Mid Sussex District. Paragraph 47 of the NPPF states that Local Plan should meet the full objectively assessed needs for market and affordable housing in the housing market area.

1.6 Despite this clear steer within the NPPF (which is also reflected in the supporting Planning Practice Guidance) the approach of WDC simply considers the housing need looking to within its District only. Such an approach is contrary to the NPPF.

1.7 Instead, WDC are not apparently planning to meet the NPPF requirements to identify and plan for the full objectively assessed housing needs of the wider spatial context and the Housing Market Area within which the District also lies. This is no reasoned justification for such an approach to be undertaken.
**Question 54. Is the level of housing planned appropriate? Should it be increased or decreased? If so, to what level and on what basis?**

1.8 Draft Policy WLP 1 sets out that some 14,228 homes will be delivered over the Plan period. This equates to approximately 950 homes per annum. This figure is identified within the WLP to reflect the OAHN for the District – as outlined at Paragraph 6.33 of the WLP.

1.9 We have significant concerns with regard to the approach undertaken in assessing the OAHN. As outlined in our Matter 2 Statement, it is clear that the WLP makes no allowance for meeting unmet needs of neighbouring authorities, including those within the same Housing Market Area – contrary to the requirements of the Duty to Co-operate.

1.10 Whilst we do not seek to repeat the points raised, the housing requirement figure currently outlined in the WLP needs to substantially increase.

1.11 Against this background, the supply of housing land being planned for should be increased in order to reflect its own as well and the wider spatial area’s housing needs.